

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

HUONG HOANG, an individual,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation; and IMDb.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV-01709-MJP

DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO SEAL
DEFENDANTS' SUPPORTING
DOCUMENTS

NOTED FOR MOTION CALENDAR:
December 7, 2012

I. INTRODUCTION

Defendants Amazon.com, Inc. and IMDb.com, Inc. (collectively, "Defendants") do not oppose sealing (a) truthful, non-redacted personal identification documents, (b) tax returns, and (c) documents that reveal Plaintiff Huong Hoang's ("Hoang") methods for obtaining acting roles. However, several of the central documents in this case do not fall in any of those three categories and Hoang has not presented compelling reasons for sealing them. These documents (which include fake personal identification documents, information about Hoang's claimed damages, and general information regarding her acting career) should not be sealed.

II. BACKGROUND

On July 3, 2012, this Court entered a Stipulated Protective Order ("Protective Order"), Dkt. No. 58, which allows the parties to designate documents and deposition testimony as

DEFENDANTS' OPP. TO PL.'S MOTION
TO SEAL (No. 2:11-CV-01709-MJP) – 1

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1 “Confidential” or “Highly Confidential—Attorneys’ Eyes Only.” Dkt. No. 58, §§ B(5), (6). The
 2 Protective Order provides that if a party wants to file with the Court material designated as
 3 “Confidential” or “Highly Confidential—Attorneys’ Eyes Only,” it shall provide the party who
 4 designated the material with at least five days’ notice of its intent. *Id.*, § F. The designating party
 5 then must file a motion to seal such material (or, in the alternative, withdraw its confidentiality
 6 designations). *Id.*

7 On November 21, 2012, Defendants notified Hoang that they intended to file with this
 8 Court certain documents and deposition testimony that Hoang previously designated as
 9 “Confidential” or “Highly Confidential—Attorneys’ Eyes Only.” Decl. of Ashley Locke
 10 (“Locke Decl.”), Ex. A. Defendants requested that, if Hoang did not intend to move to seal any
 11 of the documents identified, she withdraw her designations of those documents so that they may
 12 be filed publicly. *Id.* Hoang did not withdraw any designations and therefore Defendants filed
 13 all documents designated by Hoang as “Confidential” or “Highly Confidential—Attorneys’ Eyes
 14 Only” under seal, as required by the Protective Order. *See* Dkt. No. 58 § F; *see also* Dkt. Nos.
 15 93-95 (sealed documents). IMDb also filed under seal portions of its brief and supporting
 16 declarations that revealed information designated by Hoang as “Confidential” or “Highly
 17 Confidential—Attorneys’ Eyes Only.” Dkt. Nos. 82, 85, 87.

18 Simultaneously with Defendants’ filings, Hoang filed her Motion to Seal Defendants’
 19 Supporting Documents (“Motion to Seal”), but the Motion to Seal addressed only some of those
 20 documents and only selected portions of the deposition testimony at issue. Dkt. No. 96. Hoang
 21 apparently concedes those documents should not be sealed.

22 A list of documents and testimony currently filed under seal is attached as Appendix A. It
 23 further identifies: (a) those documents and testimony that Hoang did not address in her Motion to
 24 Seal (identified as “Waived”); (b) those documents that Hoang did address in her Motion to Seal
 25 but which, as addressed below, there is no compelling reason justifying sealing (identified as

1 “No Compelling Reason”); and (c) those documents and testimony that Defendants do not object
 2 to remaining under seal (identified as “No Objection”).
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4 5 6 7 **III. ARGUMENT**

8 **A. Hoang Must Provide a Compelling Reason to Seal**

9 The Ninth Circuit recognizes a “strong presumption in favor of access” to documents
 10 submitted in support of dispositive motions. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d
 11 1172, 1178 (9th Cir. 2006) (citing *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135
 12 (9th Cir.2003)). The party seeking to seal a judicial record bears the burden of overcoming this
 13 strong presumption by “articulat[ing] compelling reasons supported by specific factual findings.”
 14 *Kamakana*, 447 F.3d at 1178-79 (internal quotation and citations omitted). In analyzing the
 15 proponent’s request for sealing, the court balances the proponent’s desire against the interests of
 16 the public. *Id.* “The mere fact that the production of records may lead to a litigant’s
 17 embarrassment, incrimination, or exposure to further litigation will not, without more, compel
 18 the court to seal its records.” *Id.* at 1179.
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29 **B. Hoang Fails to Establish a Compelling Reason to Seal Fake or Novelty Identification** 30 **Cards and Related Testimony**

31 In her Motion to Seal, Hoang requests that the Court seal a category of documents titled
 32 “Personal Information and Documents.” Dkt. No. 96 at 2-4. These documents include Hoang’s
 33 driver’s license and passport cover page, her birth certificate (with the date of birth redacted),
 34 Hoang’s fake identification card and passport, and portions of her and her agent’s deposition
 35 testimony. *Id.* at 3. Defendants do not object to sealing copies of Hoang’s true passport and
 36 driver’s license. *See* Decl. of Breena M. Roos (“Roos Decl.”) (Dkt. No. 92), Ex. E. But Hoang
 37 has not provided any compelling reason to seal other documents in this category.
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46 First, Hoang seeks to seal *fake* identification documents including: a redacted birth
 47 certificate that does not display a year of birth, a fake state identification card, and a fake United
 48 States passport. *See* Roos Decl., Exs. F, N, Z, AA. Hoang has not demonstrated how or why
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1 these inauthentic documents would pose a true identity theft threat. The forged, “novelty”
 2 documents do not reveal any true identifying information about Hoang—they do not contain true
 3 identification numbers or her legal name. *See* Roos Decl., Exs. Z, AA. Moreover, these
 4 documents are of central importance to this case: Hoang herself submitted them to IMDb in her
 5 effort to convince IMDb that her date of birth was a different date that it actually is.
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 11 Second, Hoang makes the blanket claim that her “personal information is revealed” in
 12 deposition testimony, but fails to provide this Court with any compelling reason to justify such
 13 testimony. An examination of this testimony reveals that it does not identify any personal
 14 information about her. For example, Hoang has asked this Court to seal her agent’s testimony
 15 regarding how old he “guessed” she was. *See* Roos Decl., Ex. DDD at 30:1-4, 32:2-7. She has
 16 also asked to seal her own testimony about how old Hoang tells people she is, Roos Decl., Ex. A
 17 at 162:2-8; how long she has worked with certain colleagues, *id.* at 173:2-7; her efforts to get
 18 IMDb to remove the date of birth from her profile, *id.* at 210:2-213:2, 254:2-264:24, 266:3-20;
 19 268:11-291:16; her speculations regarding why she was not offered certain roles, *id.* at 213:2-
 20 219:2, and testimony about the fake identification documents discussed above. *Id.* at 264:2-24;
 21 280:2-282:10. It is hard to see how anyone could use this information to impersonate Hoang.
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33 Finally, although she does not articulate it, Hoang requests that this Court seal her true
 34 date of birth (or any year from which one could guess her year of birth). *See* Roos Decl., Ex. A
 35 at 143:203. Hoang’s date of birth is of central issue in this case and Hoang placed it at issue by
 36 bringing this lawsuit. In declining Hoang permission to proceed anonymously, this Court
 37 implicitly recognized that Hoang does not have a privacy interest in hiding her age. Dkt. No. 33.
 38 Hoang cannot use the sealing mechanism to get around this Court’s prior ruling.
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45 **C. Hoang Fails to Establish a Compelling Reason to Seal Documents Regarding Her**
 46 **Claimed Damages**

47 Hoang also asks this Court to seal documents and testimony that she claims reveals
 48 “personal financial information.” While Defendants do not object to sealing Hoang’s tax returns
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1 and records showing her income, *see* Roos Decl., Exs. GG, HH, II, JJ, KK, LL, WW, XX, there
 2 is no compelling reason to seal the interrogatory response in which she outlines her damages
 3 claims and deposition testimony in which she explains those claims. *See* Roos Decl., Ex. B,
 4 Ex. A at 299:2-306:20, Ex. MM at 453:14-461:22. Hoang provides no support for sealing
 5 information regarding what she claims as damages. Hoang chose to file this lawsuit—and her
 6 lack of damages and injuries are at the heart of Defendants’ summary judgment motions.
 7 Hoang’s “desire for privacy” and claim that documents and deposition transcripts contain
 8 “personal information” do not override the public interest in open court proceedings necessary to
 9 warrant their sealing.
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 19 **D. Hoang’s Request to Seal “Trade Secret” Information is Overbroad**

20 Hoang asks this Court to seal documents that she calls “trade secret information,” such as
 21 documents showing her history of submitting for and auditioning for roles and other documents
 22 that discuss her acting career. While Defendants do not object to sealing documents that
 23 legitimately identify Hoang’s methods for searching for and obtaining acting roles, her request
 24 goes far beyond this category. For instance, Hoang asks this Court to seal how long she has been
 25 a client of her agent, Roos. Decl., Ex. DDD at 22:2-3, Ex. A at 165:2-5; whether or not her agent
 26 knew that Hoang had a profile on IMDb.com, *id.*, Ex. DDD at 46:13-22; and her agent’s
 27 knowledge or lack of knowledge regarding Hoang’s claimed damages. *Id.*, DDD at 47:1-24,
 28 51:2-53:25. She also seeks to seal innocuous facts such as how long she has been acting, *id.*, Ex.
 29 A at 26:2-3; who her agents are and have been, *id.*, Ex. A at 33:2-34:23; the identity of a friend
 30 and his company, *id.*, Ex. A at 50:2-24, 54:2-25, 59:2-7, 98:2-19, 100:1-105:23, 227:2-25, 249:2-
 31 50:11; and why she has not joined SAG. Ex. A at 72:2-6. General discussions about Hoang’s
 32 acting career do not amount to trade secrets. Hoang has not presented a “compelling reason” for
 33 sealing the broad strokes descriptions of her career.
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49 **E. Hoang Fails to Establish a Compelling Reason to Seal Documents and Testimony**
 50 **Not Addressed in her Motion**
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1 Finally, Hoang has not addressed many of the documents that she designated as
 2 confidential and Defendants were required to file under seal. With respect to any documents and
 3 testimony that Hoang did not address, the Court should unseal those documents. *In re Midland*
 4 *Nat. Life Ins. Co. Annuity Sales Pracs. Litig.*, 686 F.3d 1115, 1120 (9th Cir. 2012) (ordering
 5 district court to unseal documents where there were “no compelling reasons” for sealing);
 6 *Kamakana*, 447 F.3d at 1182 (upholding district court’s refusal to seal documents where
 7 proponent failed to show compelling reason to seal). The documents and testimony not
 8 addressed by Hoang’s Motion to Seal are identified in Appendix A.
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17 IV. CONCLUSION

18 For the reasons stated above, Defendants respectfully request that this Court deny
 19 Hoang’s Motion as to the documents identified as “Waived” and “No Compelling Reason” in
 20 Appendix A.
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27 DATED: December 5, 2012

28 By: s/ Ashley A. Locke
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40 Attorneys for Defendants Amazon.com, Inc.
 41 and IMDb.com, Inc.
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CERTIFICATE OF SERVICE

I certify that on December 5, 2012, I electronically filed the foregoing **DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO SEAL** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

Derek Alan Newman Keith Scully Charlotte Williams Newman Du Wors LLP 1201 Third Avenue, Ste 1600 Seattle, WA 98101	_____ Via hand delivery _____ Via U.S. Mail, 1st Class, Postage Prepaid _____ Via Overnight Delivery _____ Via Facsimile _____ Via Email <u> X </u> Via ECF _____
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I certify under penalty of perjury that the foregoing is true and correct.

DATED this 5th day of December, 2012.

s/ Ashley A. Locke
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DEFENDANTS' OPP. TO PL.'S MOTION
TO SEAL (No. 2:11-CV-01709-MJP) – 7

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APPENDIX A

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
DDD	Deposition of Joe Kolkowitz	22	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	30	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	32	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	35	No Objection
DDD	Deposition of Joe Kolkowitz	42	No Objection
DDD	Deposition of Joe Kolkowitz	46-47	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	51-53	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	58-59	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	68	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	74-75	No Compelling Reason
DDD	Deposition of Joe Kolkowitz	78	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	26	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	33-34	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	38-39	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	50	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	54	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	59	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	72	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	98	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	99	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	100 - 105	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	112-113	Waived
A	Videotaped Deposition of Huong Hoang Vol. 1	118	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	122	Waived
A	Videotaped Deposition of Huong Hoang Vol. 1	124	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	131	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	143	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	155	No Compelling Reason
	Videotaped Deposition of Huong Hoang Vol. 1	162	No Compelling Reason
	Videotaped Deposition of Huong Hoang Vol. 1	165	No Compelling Reason

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
A	Videotaped Deposition of Huong Hoang Vol. 1	173	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	176	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	200	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	204	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	210 - 219	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	221	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	227	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	249	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	250	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	252	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	254 - 262	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	263 - 264	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	265 - 266	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	268 - 278	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	279-287	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	288-291	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	297	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	299 - 306	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	308	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	314	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	318	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	320	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	322	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	324	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	326	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	330-333	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	335	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	337	No Compelling Reason

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
A	Videotaped Deposition of Huong Hoang Vol. 1	340	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	341	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	343	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	348-352	No Objection
A	Videotaped Deposition of Huong Hoang Vol. 1	378	No Compelling Reason
A	Videotaped Deposition of Huong Hoang Vol. 1	381	No Compelling Reason
MM	Videotaped Deposition of Huong Hoang Vol. 2	416-419	No Objection
MM	Videotaped Deposition of Huong Hoang Vol. 2	421-436	No Objection
MM	Videotaped Deposition of Huong Hoang Vol. 2	439-440	No Compelling Reason
MM	Videotaped Deposition of Huong Hoang Vol. 2	442-443	No Compelling Reason
MM	Videotaped Deposition of Huong Hoang Vol. 2	445-450	No Compelling Reason
MM	Videotaped Deposition of Huong Hoang Vol. 2	452-461	No Objection
MM	Videotaped Deposition of Huong Hoang Vol. 2	464-465	No Compelling Reason
B	Plaintiff's Third Supplemental Objections and Responses to Defendants' Interrogatories and Requests for Production to Plaintiff, Exhibit 1 to <u>Hoang Deposition, Volume 1, July 26, 2012</u>		No Compelling Reason
C	IMDbPro: Junie Hoang: Main Details Page (6 pages), Exhibit 2 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived
E	Hoang Driver's License and Passport Cover Page, Bates Numbered 000065, Exhibit 9 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		No Objection
F	Hoang's Redacted Birth Certificate, Bates Numbered 000064, Exhibit 10 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		No Compelling Reason
G	Bates numbered documents IMDb 001291-1293 (3 pages), Exhibit 11 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived
H	Bates numbered document IMDb 001037 (1 page), Exhibit 12 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived
I	Bates numbered documents IMDb 001675-1676 (2 pages), Exhibit 13 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived
J	Bates numbered documents IMDb 001375 (1 page), Exhibit 14 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived
K	Bates numbered document IMDb 001373 (1 page), Exhibit 15 to Hoang Deposition, Volume 1, <u>July 26, 2012</u>		Waived

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
L	Bates numbered documents IMDb 001356-1357 (2 pages), Exhibit 16 to Hoang Deposition, Volume 1, July 26, 2012		Waived
M	Bates numbered document IMDb 000960 (1 page), emails between IMDb Help Desk and Junie Hoang in Jan. 2008, Exhibit 18 to Hoang Deposition, Volume 1, July 26, 2012		Waived
N	Bates numbered document IMDb 001051-1052 (2 pages), Exhibit 19 to Hoang Deposition, Volume 1, July 26, 2012		No Compelling Reason
O	Bates numbered document IMDb 000961 (1 page), emails between IMDb Help Desk and Junie Hoang in April 2008, Exhibit 20 to Hoang Deposition, Volume 1, July 26, 2012		Waived
P	Bates numbered documents IMDb 001050 and 001044 (2 pages), letters from Mack and Hoang to IMDb dated July 11, 2008, Exhibit 21 to Hoang Deposition, Volume 1, July 26, 2012		Waived
Q	Bates numbered document Hoang 000003, email from Bosby to To Whom it May Concern, dated June 20, 2011 (1 page), Exhibit 22 to Hoang Deposition, Volume 1, July 26, 2012		Waived
R	Bates numbered document IMDb 000984, email from Nadia, IMDb Help Desk to Junie Hoang, dated September 12, 2008 (1 page), Exhibit 23 to Hoang Deposition, Volume 1, July 26, 2012		Waived
S	Bates numbered document IMDb 000985, email from the IMDb Help Desk to Junie Hoang dated September 15, 2008 (1 page), Exhibit 24 to Hoang Deposition, Volume 1, July 26, 2012		Waived
T	Bates numbered document IMDb 001032-1033 (2 pages), emails between Hoang and IMDb Help Desk in September 2008, Exhibit 25 to Hoang Deposition, Volume 1, July 26, 2012		Waived
U	Bates numbered document IMDb 001289 (1 page), Exhibit 26 to Hoang Deposition, Volume 1, July 26, 2012		Waived
V	Bates numbered document IMDb 000986, Email from Nadia The IMDb Help Desk to Junie Hoang, dated September 24, 2008 (1 page), Exhibit 27 to Hoang Deposition, Volume 1, July 26, 2012		Waived
W	Bates numbered document IMDb 001288 (1 page), Exhibit 28 to Hoang Deposition, Volume 1, July 26, 2012		Waived
X	Bates numbered document IMDb 000963 (1 page), Emails from The IMDb Help Desk to Junie Hoang and from Junie Hoang to the IMDb Help Desk, dated November 2008, Exhibit 29 to Hoang Deposition, Volume 1, July 26, 2012		Waived
Y	Bates numbered document IMDb 001283-1284 (2 pages), Exhibit 30 to Hoang Deposition, Volume 1, July 26, 2012		Waived

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
Z	Texas issued ID to Junie Hoang, Bates numbered Hoang 000070, Exhibit 31 to Hoang Deposition, Volume 1, July 26, 2012		No Compelling Reason
AA	Bates numbered document Hoang 000071, Passport Cover Page, Exhibit 32 to Hoang Deposition, Volume 1, July 26, 2012		No Compelling Reason
BB	Bates numbered documents IMDb 001281-001282, Exhibit 33 to Hoang Deposition, Volume 1, July 26, 2012		Waived
CC	Bates numbered documents 001035-001036, emails to and from Junie Hoang and the IMDb Help Desk (2 pages), dated November 2008, Exhibit 34 to Hoang Deposition, Volume 1, July 26, 2012		Waived
DD	Bates numbered document IMDb 001270, Exhibit 35 to Hoang Deposition, Volume 1, July 26, 2012		Waived
EE	Bates numbered document IMDb 001259-1260 (2 pages), Exhibit 36 to Hoang Deposition, Volume 1, July 26, 2012		Waived
FF	Bates numbered document Hoang 000001, Updating Information for Junie Hoang, Exhibit 37 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
GG	Bates numbered documents Hoang 000021-23 (3pages), Exhibit 38 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
HH	Bates numbered documents Hoang 000024-26 (3 pages), Exhibit 39 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
II	Bates numbered documents Hoang 000031-39 (9 pages), 2008 tax returns, Exhibit 40 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
JJ	Bates numbered documents Hoang 000040-44 (5 pages), 2009 tax returns, Exhibit 41 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
KK	Bates numbered documents Hoang 000045-55 (11 pages), 2010 tax returns, Exhibit 42 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
LL	Bates numbered documents Hoang 000056-63 (8 pages), 2011 tax returns, Exhibit 43 to Hoang Deposition, Volume 1, July 26, 2012		No Objection
FFF	Bates numbered documents Hoang 000200-202 (3 pages), Actors Access, Exhibit 47 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
NN	Bates numbered documents Hoang 000170-185, Actors Access, Exhibit 48 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
OO	Bates numbered documents Hoang 000565-588, Casting Frontier, Exhibit 50 to Hoang Deposition, Volume 2, August 7, 2012		Waived

Roos Decl. Exhibit Letter	Document Description	Page(s) of Deposition	Motion to Seal
PP	Bates numbered document Hoang 000186, Casting Frontier, Exhibit 51 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
QQ	Bates numbered documents Hoang 000589-594, Casting Networks Incorporated, Exhibit 52 to Hoang Deposition, Volume 2, August 7, 2012		Waived
RR	Bates numbered documents Hoang 000595-600, Exhibit 53 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
SS	Bates numbered documents Hoang 000601-662, Now Casting, Exhibit 54 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
TT	Bates numbered document Hoang 000187, Now Casting, Exhibit 55 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
UU	Plaintiff's Objections and Responses to Defendants' Second Set of Interrogatories and Requests for Production to Plaintiff, dated August 2, 2012, Exhibit 56 to Hoang Deposition, Volume 2, August 7, 2012		No Compelling Reason
VV	Plaintiff's Amended Objections and Responses to Defendants' Second Set of Interrogatories and Requests for Production to Plaintiff, dated August 6, 2012, Exhibit 57 to Hoang Deposition, Volume 2, August 7, 2012		Waived
WW	Bates numbered documents Hoang 000167-169, Exhibit 58 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
XX	Bates numbered documents Hoang 000164-166, Exhibit 59 to Hoang Deposition, Volume 2, August 7, 2012		No Objection
GGG	Bates numbered documents Hoang 000170-187, Actors Access		No Objection
FFF	Bates numbered documents Hoang 000200-662, Actors Access		No Objection